UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

A.J. & Q.C.,

Plaintiffs,

CIVIL ACTION FILE

v.

NO. 1:23-cv-4247-JPB

MASP, LLC,

Defendant.

CONSENT MOTION FOR EXTENSION OF TIME

Plaintiffs A.J. and Q.C. and Defendant MASP, LLC request an extension of time until November 8, 2024 to respond to the Motions for Summary Judgment and file replies to Motions for Summary Judgment no later than November 22, 2024, showing this honorable Court as follows:

1.

Plaintiffs' counsel is currently preparing for trial in the Northern District of Georgia, Atlanta Division (*H.B. v. Red Roof Inns, Inc., et al.*, Case No.1:22-cv-01181-JPB). The trial commences on November 12, 2024.

2.

Given the demanding nature of trial, the parties agree that an extension of time is necessary to file responses and replies to the Motions for Summary Judgment.

3.

Accordingly, the parties request an extension of time until November 8, 2024 to respond to the Motions for Summary Judgment and file replies to Motions for Summary Judgment no later than November 22, 2024.

4.

The parties present this motion to the Court in good faith and not for purposes of delay. The parties do not anticipate needing additional extensions.

Respectfully submitted this 30th day of October, 2024.

ANDERSEN, TATE & CARR, P.C.

/s/ Jonathan S. Tonge

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CERTIFICATE OF COMPLIANCE

Under Local Rules 5.1(C) and 7.1(D), I hereby certify that the foregoing filing complies with the applicable font type and size requirements and is formatted in Times New Roman, 14-point font.

ANDERSEN, TATE & CARR, P.C.

/s/ Jonathan S. Tonge

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will automatically send email notification of such filing to the attorneys of record.

Respectfully submitted this 30th day of October, 2024.

ANDERSEN, TATE & CARR, P.C.

/s/ Jonathan S. Tonge

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